DRAFT
7/20/83

Reviewed
NOD response
4/11/84

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ATTACHMENT: Pratt & Whitney Aircraft
EPA I.D. Number CTD990672081
Permit Application Notice of Deficiency

The following information outlines areas where the Pratt & Whitney permit application does not meet the requirements for a RCRA permit application given in 40 CFR Part 270 and refer to standards for hazardous waste management facilities in 40 CFR Part 264. Additional information is necessary in each of the following areas in order to begin a more technical review of Pratt & Whitney's RCRA permit application.

I. Revised Part A Dated 4/20/83

A. On page 3A, lines 21 - 26 and page 3B, lines 1 - 26 are summed to estimate 307 tons/yr. of various F & U waste organic compounds which will be incinerated. Since the incinerator operating conditions will be dictated by the most difficult burning waste, the company should seek to relatively quantify a percent of each waste type which might be incinerated during a given year to aid in selecting the principal organic hazardous constituents (POHC) of interest.

new Part A say 90% are F001+F002 OK?

B. There seems to be inconsistencies in the process design capacity mentioned in the revised Part A, the Part B information and the closure plan. Please clarify and make consistent --

1. S01 - Storage in Containers

a. Revised Part A = 182,250 gallons now 68840 gal OK

b. Part B

OK

i. container storage bldg. on page 101: 1000 barrels @ 55 gal. = 55,000 gal. ✓

ii. transporter storage pad on page 100: 24 30 transporters @ 375 gal. = 11,250 gal. 9000 ✓

iii. barrel/transporter storage pad on page 101: 100 barrels @ 55 = 5,500 gal.
now 86 or 4840 ✓
16 transporters @ 375 = 6,000 gal.
10 = 3750

Therefore:
Total Part B Storage = 72,250

c. Closure Plan on Page 65: 55,000 gal. + 9000 + 4840 ✓
Maximum Inventory - Barrel Storage OK

2. S02 - Storage in Tanks

OK

a. Revised Part A and;

b. Part B on Page 104 - 8 tanks = 27,300 gal.

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c. Closure Plan on Page 65
Maximum Inventory - Tank Storage = 32,000 gal. now 27,300 ✓

3. T03 - Liquid Injection Incinerator

OK

a. Revised Part A = ~~50~~ 48 gal./hr. ✓ OK

b. Part B - Page 111
Maximum Waste Flow Rate = ~~47~~ 48 gal./hr.

II. Facility Description

A. Topographic Map (§§270.14 - formerly 122.25(a)(19)(i-xii))

The submitted topographic map at page 75 does not completely satisfy the information requirements. The following must also be submitted:

1. North area of map along Rigley Street only shows approximately 400' around facility. Up to 1000' must be included, also include surrounding land uses; and

OK except not addressed

a. Include a wind rose; new P. 74

b. Include location of any injection or withdrawal wells both on-site and off-site;

new 75A

c. Include other structures; run-off control systems, storm, sanitary and process sewer systems, loading and unloading areas, ~~fire control facilities~~; not addressed not noted?

d. Indicate the waste hauler traffic pattern and control; show turns across traffic lanes and stacking lanes if appropriate, show traffic control signals. new 75B

III. Waste Characteristics

A. Chemical and Physical Characteristics - (§§270.14-formerly 122.25 (a)(2) and 264.13)

OK P. 9 + 9A

The Company states the primary basis for characterization of waste will be the process information of known process solutions which are found to no longer meet operating specifications as determined by the material control laboratory. Since a process solution may be discarded for other reasons besides reduced strength, including spill clean-up or contamination with other materials, please detail a frequency of when analysis of chemical characteristics will be conducted to verify assumed process information.

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400

Also, please identify the number of individual "Process Solutions" which "descriptions are contained in volumes of literature located near the treatment area." At this time, copies of those solutions specifications are not needed for submittal.

OK

IV. Process Information

A. Containers - (§§ 270.15(a) - formerly 122.25(b)(1)(i)(A) and 264.171 and 172)

1. For barrels and transporters, please discuss how the company ensures compatibility of the waste with the container. Also are the barrels reused or new, and do they meet DOT specifications? Describe a transporter.

OK - DOT - P. 99R.

P 100 - B (2)

2. Container Management Practices

Include discussion on procedures used to ensure that hazardous waste containers are always kept closed except when adding or removing waste, and that they are stored, transported, opened, and handled in a manner that they do not rupture or leak.

OK - P. 99 B

Also, please provide figures drawn to scale of the plan for aisle space for the maximum planned inventory for the 3 storage areas.

P. 99 B, 100 A
101 B - Aisle space? ≡ comment on page 102?

Include sample computer reports which will be used to ensure the 1,000 drum maximum and the 350 maximum free-liquid drums is not exceeded.

P. 161 B
Exhibit DD

3. Containment Systems

however unclear as to how totals are shown?

For all container storage areas, provide dimensions and calculations which support containment volumes shown in the application, in addition

a. Container Storage Building:

Check calculations on 99A + 102A etc.

This building has 5 separate containment areas, however, the Part B is not clear on how the 350 free-liquid barrels maximum will be distributed among the 5 areas to ensure minimum 10% volume containment in each compartment.

b. Transporter Storage Pad

Also

Similarly, this pad has 3 separate compartments, detail the individual volumes and arrangement of the 30 transporters in each compartment to verify 10% volume containment.

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OK
re: 101 B+C

c. Barrel/Transporter Storage Pad

Describe how barrels and/or transporters are arranged on this pad. How are barrels kept away from contact with any accumulated liquids?
↳ pallets

4. Incompatible Waste

OK

Page 101 stated incompatible waste are stored in non-adjacent compartment, please clarify and state which compartments are used for which type of wastes to ensure no incompatible waste mixing if leaks occur.

B. Tanks - (§§ 270.16 formerly 122.25(b)(2) and 264.191)

1. Description of Tanks

OK
p.104A

For the eight tanks listed on page 104, please designate for each: the specific design standard, construction materials, and liner if appropriate, actual shell thickness versus design thickness, subsurface and foundation construction. Note Page 6 states only 4 tanks are EPA regulated; however, please supply above information for all eight as required by DEP.

2. Tank Corrosion and Erosion (264.194(b))

OK - new p.30 Tank Inspection Guide.

The Company must develop a schedule and procedure for assessing the interior condition of all tanks.

OK –

On page 23, the Company plans to sample tank contents (process) when tank is to be emptied. Please expand on this practice, specifically your procedures to ensure incompatible materials are not mixed or cause harm to tank materials (see 264.17(b)). OK

3. Page 104 notes secondary containment is provided for all storage tanks. Although this is not required under present Federal regulations, please provide the containment volume available for each tank, and how incompatible mixing is prevented

Why no containment on wax/solvent - does it flow? - is it precipitation hr?

C. Incinerator (§§270.19 formerly 122.25(b)(5)(i) and 264.340)

1. Waste Analysis

p. 161 - Exhibit BB
< 100 ppb in CN
Purgeable organics?
is this enough?

The Company proposes to burn two distinct hazardous waste feeds, cyanide solutions and waste solvent/wax/still bottoms. The company must provide a more complete characterization of each feed. The CN-solutions should be analyzed to verify the lack of significant 40 CFR Part 261 Appendix VIII organics constituents.

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The waste organic feed stream must be better defined to include an identification of any hazardous organic constituents listed in 40 CFR Part 261, Appendix VIII which are present in significant amounts (>100ppm) in the waste to be burned, and approximate quantification of the hazardous constituents identified in the waste, within the precision produced by the analytical methods specified in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" or their equivalent (see §122.20 for reference). Also, the application notes a future solvent recovery process addition which is likely to alter the future character of that feed to the incinerator, please discuss the company's plan to characterize that new waste stream to aid in selecting future POHC's.

2. Description of Incinerator

pitot tube p. 108

The Company has provided specification on the prime air mover, please describe the equipment used to continuously monitor and record the combustion gas velocity.

OK

Similarly, the application states the waste feed rate is monitored, but please describe how the waste feed rate is recorded. The company states on page 119 an 1800°F feed shut-off temperature, ~~however~~, sets a minimum operating temperature of 1832°F, please make consistent.

by operator.

3. Test Schedule

OK

The Company has not specified when the trial burn will be conducted. - Still unknown

4. Auxiliary Fuel

The Company has not specified an auxiliary fuel feed rate for each test burn. - depends on organic fuel values

5. Operating Conditions for Pollution Control Devices

not addressed needed?

Please designate the operational temperature for inlet gases to the packed tower scrubber, other than only "to protect the packing."

OK

The application is not consistent on the planned operational pH of the scrubber solution, page 109 states 8.0-8.5 and pages 111 and 117 state 7.5-8.5, please make the application consistent.

7.0 - 8.5

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V. Contingency Plan - (§§270.14-formerly 122.25(a)(7) and 264.50-56)

p. 45A Describe the Company procedures for ensuring that all emergency equipment listed in the plan is cleaned and fit for its intended use before operations are resumed following any incident requiring implementation of the contingency plan.

P39 - Verbal now, new alarm coming The plan does not describe the specific signal which will be given if evacuation is necessary.

VI. Personnel Training - (§§270.14-formerly 122.25(a)(2)) and 264.16)

p. 62 OK The Company did not identify a Training Director (264.16(a)(2), and his/her qualifications.

VII. Closure Plan - (§§270.14-formerly 122.25(a)(13) and 264.112)

P. 63 - A. The Company did not estimate a date of closure. - never

B. The Company plans to take more than 180 days to complete closure, please justify per 264.113(a)&(b). Also, make the closure milestones consistent on page 65 (9 months, January thru September) and page 66 (one year for closure)

not change yet → should be 9 months!

Upon closure, describe management of empty containers and transporters within section J(V) at page 70.

OK but same as old 1982 $?

Please update closure cost estimate to May, 1983 on page 73.

VIII. Liability Insurance - (§§270.14-formerly 122.25(a)(17) and 264.147(a)(1)(i)

The Company provided an insurance policy for the proper liability, however, the attached Hazardous Waste Facility Liability Endorsement does not follow the language required by 264.151(i), please resubmit an appropriately worded endorsement. The endorsement must be worded exactly as specified in §264.151(i).

See comment in Middletown NOD